

REMARKS

Applicants will address each of the Examiner's objections and rejections in the order in which they appear in the Office Action.

Claim Objections

In the Office Action, the Examiner objects to Claims 6-13 under 37 CFR 1.75(c) as being in improper form because a multiple dependent claim cannot depend on a multiple dependent claim. Accordingly, Applicants have amended the claims to remove the improper multiple dependencies. Therefore, it is respectfully requested that this objection be withdrawn, and these claims examined.

Claim Rejections - 35 USC §112

The Examiner also rejects Claims 1-5 under 35 USC §112, second paragraph as being indefinite. It is respectfully submitted that the amendments herein overcome each of the Examiner's objections, and it is respectfully requested that this rejection be withdrawn.

Claim Rejections - 35 USC §102

The Examiner also rejects Claims 1 and 2 under 35 USC §102(b) as being anticipated by Gill, Jr. (US 5,144,711). This rejection is respectfully traversed.

Gill, Jr. is directed to a cleaning apparatus in which the scrub pads and a wafer or substrate all rotate respectively to scrub-clean the substrate. In the cleaning apparatus in Gill, Jr., each rotation shaft (axis) of the scrub pads and the substrate is fixed.

In contrast, the claimed invention is directed to a scrub cleaning device in which the substrate held between two scrubbers can be conveyed in a rotation direction by rotation of the scrubber, a peripheral speed difference can then be generated between the substrate and the scrubber by a friction force generated by an abutment on the guide member, and the substrate and scrubber rub each other to perform the scrub cleaning (see page 14, lines 20-26; page 18-21 in the present application). Further, while the rotation shaft (axis) of the scrub pads in Gill, Jr. is fixed, in the claimed invention, the axis of the substrate is not fixed for conveyance.

Therefore, it is respectfully submitted that Gill, Jr. fails to disclose or suggest the claimed invention or a device capable of performing these features of the claimed invention, and the claims are patentable thereover. Hence, it is respectfully requested that this rejection be withdrawn.

Claim Rejections - 35 USC §103

The Examiner also rejects Claims 3-5 under 35 USC §103(a) as being unpatentable over Gill, Jr. This rejection is also respectfully traversed.

For reasons similar to those explained above, these claims are also not disclosed or suggested by Gill, Jr. Hence, it is respectfully requested that this rejection be withdrawn.

Conclusion

Therefore, it is respectfully submitted that the present application is now in a condition for allowance and should be allowed.

If any additional fee is due for this Amendment, please charge our deposit account 50/1039.

Favorable reconsideration is earnestly solicited.

Respectfully submitted,

Date: April 29, 2005



Mark J. Murphy
Registration No. 34,225

COOK, ALEX, McFARRON, MANZO,
CUMMINGS & MEHLER, LTD.
200 West Adams Street
Suite 2850
Chicago, Illinois 60606
(312) 236-8500

Customer no. 000026568